

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PROJECT VERITAS ACTION FUND,
Plaintiff,

v.

DANIEL F. CONLEY,
Defendant.

Civil Action No. 1:16-cv-10462-PBS

**DISTRICT ATTORNEY DANIEL CONLEY'S MOTION TO EXTEND
PARTIES' TIME TO FILE AND RESPOND TO DISPOSITIVE MOTIONS**

Defendant Daniel Conley, the District Attorney for Suffolk County, respectfully requests that this Court extend the parties' time both: (1) to file dispositive motions, from the current deadline of May 11, 2018, by three weeks until June 1, 2018; and (2) to file responses to dispositive motions, from the current deadline of June 8, 2018, by three weeks until June 29, 2018. As grounds, DA Conley states:

1. All discovery in this case was completed by April 13, 2018, in accordance with the schedule set by this Court. See #95. The parties have now turned to preparing dispositive motions, which are currently due to be filed by May 11, 2018.
2. Unfortunately, undersigned counsel's responsibilities with respect to other matters over the past several weeks now will prevent him from completing a dispositive motion in time to file by the current deadline of May 11. Those other responsibilities include:
 - a. Discovery-related motion practice in the parallel case of Martin v. Evans, No. 1:16-cv-11362-PBS;
 - b. Preparation of a motion to dismiss in Shaw v. Rodrigues, No. 17-cv-10282-DPW, which was filed on April 19, 2018;